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12 *Attorneys for Defendants*
 13 *YOUTUBE, LLC and SUNDAR PICHAI*

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15 UNITED STATES DISTRICT COURT

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NORTHERN DISTRICT OF CALIFORNIA

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OAKLAND DIVISION

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19 DONALD J. TRUMP et al.,

) CASE NO.: 4:21-cv-08009-YGR

20 Plaintiffs,

) **STIPULATION AND [PROPOSED]**
) **ORDER TO CONTINUE INITIAL**
) **CASE MANAGEMENT**
) **CONFERENCE**

21 v.

22 YOUTUBE, LLC et al.,

) Hon. Yvonne Gonzalez Rogers

23 Defendants.

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1 A Joint Case Management Statement on the above-captioned matter is currently due June
 2 2, 2025, and an Initial Case Management Conference is set for June 9, 2025, at 2:00 p.m. via
 3 videoconference.

4 The parties have engaged in productive discussions regarding next steps in this case, with
 5 additional discussions anticipated in the near future.

6 The parties therefore respectfully request that the Initial Case Management Conference be
 7 deferred by 90-days to September 8, 2025, and the Joint Case Management Statement be due
 8 September 2, 2025.

9 Respectfully submitted,

10 Dated: May 27, 2025

FERGUSON COHEN, LLP

11 By: /s/ John Q. Kelly

12 John Q. Kelly
 jkelly@fercolaw.com

13 *Attorney for Plaintiffs*

14 DONALD J. TRUMP, KELLY VICTORY,
 15 AUSTEN FLETCHER, AMERICAN
 CONSERVATIVE UNION, ANDRES
 BIAGGIANI, MARYSE VERONICA JEAN-
 LOIUS, NAOMI WOLF, AND FRANK
 VALENTINE

17 Dated: May 27, 2025

18 WILSON SONSINI GOODRICH & ROSATI
 Professional Corporation

19 By: /s/ Brian M. Willen

20 Brian M. Willen
 bwillen@wsgr.com

22 *Attorneys for Defendants*

23 YOUTUBE, LLC AND SUNDAR PICHAI

24 SIGNATURE ATTESTATION

25 I, Brian M. Willen, am the ECF User whose ID and password are being used to file this
 26 document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence
 27 in the filing of this document has been obtained from the other signatory.

28 /s/ Brian M. Willen

1 ~~[PROPOSED]~~ ORDER

2 Pursuant to stipulation, IT IS SO ORDERED. The Initial Case Management Conference
3 is reset for September 8, 2025. The parties Joint Case Management Statement is due September
4 2, 2025.

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6 Dated: May 28, 2025

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Hon. Judge Yvonne Gonzalez Rogers